

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: ASCALADE TECHNOLOGIES, INC.)	Case No. 08-10612 & 08-10616
)	Jointly Administered
)	
Debtor in a Foreign Proceeding.)	
)	Hon. Susan Pierson Sonderby
)	
)	Chapter 15

NOTICE OF MOTION

PLEASE TAKE NOTICE that on Wednesday, February 24, 2010, at the hour of 10:00 a.m., or as soon thereafter as counsel may be heard, before the Honorable Susan Pierson Sonderby or before any other judge who may be sitting in her place and stead in Room 642 of the United States Bankruptcy Court for the Northern District of Illinois, Eastern Division, 219 S. Dearborn Street, Chicago, Illinois 60604, and we shall then and there present the Foreign Representative's **MOTION FOR ENTRY OF AN ORDER CLOSING THESE JOINTLY ADMINISTERED CASES PURSUANT TO § 350 OF THE UNITED STATES BANKRUPTCY CODE**, a copy of which is hereby served upon you.

Respectfully submitted,

for DELOITTE & TOUCHE INC., in its capacity as Foreign Representative of Ascalade Communications Inc. and Ascalade Technologies Inc., and not in its personal capacity

By /s/ Jeffrey G. Close
One of Its Attorneys

Jeffrey G. Close (ARDC #6224679)
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Telephone: (312) 845-3000

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE: ASCALADE TECHNOLOGIES, INC.) Case No. 08-10612 & 08-10616
) Jointly Administered
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) Hon. Susan Pierson Sonderby
Debtor in a Foreign Proceeding.)
) Chapter 15

**FOREIGN REPRESENTATIVE’S MOTION FOR ENTRY OF AN ORDER
CLOSING THESE JOINTLY ADMINISTERED CASES
PURSUANT TO § 350 OF THE UNITED STATES BANKRUPTCY CODE**

Deloitte & Touche Inc., not individually, but solely as former Monitor (the “*Monitor*” or the “*Petitioner*”), appointed in the matter of Ascalade Communications, Inc. and Ascalade Technologies, Inc. (the “*Foreign Debtors*”) in the Supreme Court of British Columbia, No. S081520, under the Companies’ Creditors Arrangement Act, the Canada Business Corporations Act, and the British Columbia Business Corporations Act, (the “*Foreign Proceeding*”), and recognized as “Foreign Representative” under Chapter 15 of the United States Bankruptcy Code (the “*Code*”), by Order of this Court entered June 10, 2008 (the “*Foreign Representative*”), respectfully moves this Court for an order administratively closing these joint administrated cases. In support of the this Motion, the Monitor states as follows:

1. Foreign Debtors commenced the Foreign Proceedings on March 3, 2008, by filing a petition in the Supreme Court of British Columbia under the Companies’ Creditors Arrangement Act, the Canada Business Corporations Act, and the British Columbia Business Corporations Act.
2. This Court recognized the Foreign Proceedings and the Foreign Representative under Chapter 15 of the Code, by Order dated June 10, 2008.
3. By order of the same date, the Court ordered Joint Administration of these proceedings under Bankruptcy Rule 1015(b).

4. The Foreign Proceedings are complete, have been fully administered (except with respect to certain “holdback funds”), and by order of the Supreme Court of British Columbia in the Foreign Proceedings, dated December 22, 2009, the Monitor has been discharged. A true and correct copy of the discharge order is attached hereto as Exhibit 1.

5. There are no pending matters in these cases before this Court.

6. Section 350(a) of the Code provides that after an estate is fully administered and the court has discharged the trustee, the Court shall close the case. 11 U.S.C. § 350(a).

WHEREFORE, the Foreign Representative respectfully requests that this Court enter a minute order, or an order in substantially the forth attached hereto, closing matter no. 08-10612 and matter no. 08-10616 pursuant to § 350(a) of the Code.

Dated: February 16, 2010

Respectfully submitted,

for DELOITTE & TOUCHE INC., in its capacity as
Foreign Representative of Ascalade
Communications Inc. and Ascalade
Technologies Inc., and not in its personal
capacity

By /s/ Jeffrey G. Close
One of Its Attorneys

Jeffrey G. Close (ARDC #6224679)
CHAPMAN AND CUTLER LLP
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CERTIFICATE OF SERVICE

I, Jeffrey G. Close, an attorney, hereby certify that, on behalf of the Foreign Representative, I caused a copy of the foregoing **Notice of Motion** and the Foreign Representative's **MOTION FOR ENTRY OF AN ORDER CLOSING THESE JOINTLY ADMINISTERED CASES PURSUANT TO § 350 OF THE UNITED STATES BANKRUPTCY CODE**, each, to be served on the persons on the attached service list by causing the same to be placed in the United States Mail, first-class, postage prepaid, and by email where email address is shown, each before 5:00 p.m. on February 16, 2010.

By /s/ Jeffrey G. Close

Service List

CANADIAN COUNSEL FOR DEBTORS

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OFFICE OF THE U.S. TRUSTEE

United States Trustee
William T. Neary
Office of the U.S. Trustee, Region 11
219 S. Dearborn Street
Room 873
Chicago, IL 60604

Administrators of the Foreign Proceeding (as defined in the Petition):

INDUSTRY CANADA

Office of the Superintendent of Bankruptcy
300 West Georgia Street, Suite 1900
Vancouver, B.C. V6B 6E1 CANADA
Attn: Bill Millar

THE COURT

Correspondence

British Columbia Supreme Court
Trial Coordinator's Office
800 Smithe Street
Vancouver, B.C. V6T 2E1

Parties to the Riparius Litigation (as defined in the Petition):

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